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BY ECF

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

December 5, 2023

Re: Stein et al. v. Skatteforvaltningen, No. 23-cv-02508 (NRB)

Dear Judge Buchwald:

We write on behalf of defendant-counterclaim plaintiff Skatteforvaltningen (“SKAT”) in opposition to plaintiffs-counterclaim defendants Matthew Stein and Jerome Lhote and counterclaim defendant Luke McGee’s letter motion (ECF No. 67) for permission to file a seven-page letter requesting a pre-motion conference on plaintiffs and counterclaim defendant’s anticipated discovery motion.

Under section 2.B of the Court’s Individual Practices, “[a] pre-motion conference is required before making any motion,” with exceptions not relevant here, and to request such a conference, “the moving party shall submit a letter not to exceed three pages in length setting forth the basis for the anticipated motion.”

Plaintiffs and counterclaim defendant’s letter motion fails to show that there is any need for an extension of the Court’s three-page limit on pre-motion conference letters for them to set forth the basis for their anticipated discovery motion, let alone why they need more than double the length prescribed by the Court’s Individual Practices to do so.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

cc: all counsel of record (via ECF)